



Michael O. Leavitt
Governor
Ted Stewart
Executive Director
James W. Carter
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

1594 West North Temple, Suite 1210

P.O. Box 145801

Salt Lake City, Utah 84114-5801

(801) 538-5340

(801) 359-3940 (Fax)

May 21, 1997

TO: File

THRU: Joe Helfrich, Permit Supervisor, Compliance *JH*

FROM: Peter Hess, Reclamation Specialist III *PH*

RE: Scalehouse Pad Pavement, Co-Op Mining Company, Bear Canyon Mine,
ACT/015/025-97B, Folder #2, Emery County, Utah

Summary:

This proposed change to the scalehouse parking area at the Bear Canyon Mine was received in the Price Field Office on May 16, 1997. These changes are in response to a notice of violation issued by the United States Environmental Protection Agency.

The information found in this proposal is not considered adequate to meet the requirements of the R-645 regulations.

The permittee should make the requisite changes to the proposal as necessary and resubmit the proposal to meet the requirements of the R645 regulations.

Technical Analysis:

The application is lacking in the following areas:

Maps, Plans, Cross Sections of Mining Plans

The permittee should revise plates 2-4B and 2-4C (surface facilities maps) to show exactly what area is to be paved. Although the text discusses a 450 foot roadway length to be surfaced, the 1 inch equals 200 foot primary haul road plan view (Plate 3-5A) lacks detail in that none of the culverts which are shown are identified. This is unclear.



Operation Plan

There is no discussion within the text as to how the permittee proposes to install the 258 cubic yards of black top. Will hot mix be hauled in? Is an on site batch plant to be set up? If so, what provisions will be made (i.e., a staging/processing area) to accomplish this and at what location? Will a special mix be utilized (i.e., reinforced blacktop), or is a standard mix expected to hold up under summer temperatures and the double trailer coal trucks?

Reclamation Plan

Page 3-97 shows bonding calculations for the reclamation and **on site** disposal of the 258 cubic yards of material. The limited testing of waste asphalt in Utah has not revealed the material to be hazardous waste. However, asphalt is not an inert waste and cannot be used as inert fill material; the Utah Department of Solid and Hazardous Waste requires a permit to dispose of this material on site. No mention is made of obtaining a permit within this proposal. The bonding calculations should show additional figures for the disposal of this material in a State certified landfill, and/or discuss the recycling of this material, whichever is the permittees choice.

FINDINGS:

It is felt that the information which has been provided in this proposal is not adequate to meet the requirements of the R-645-301-527.100-240.

RECOMMENDATION:

Prior to approval, the permittee must address the aforementioned issues as they relate to the R645 rules regarding primary haul roads.